

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

JOSEPH MANTHA, *on behalf of himself
and all others similarly situated,*

Plaintiff,

v.

QUOTEWIZARD.COM, LLC,

Defendant.

Civil Action No. 1:19-cv-12235-LTS

JOINT MOTION FOR EXTENSION OF DISCOVERY DEADLINES

Plaintiff Joseph Mantha (“Plaintiff”) and Defendant QuoteWizard.com, LLC (“QuoteWizard”) (together, the “Parties”) hereby respectfully move the Court for a thirty (30) day extension of all remaining discovery deadlines originally set forth in this Court’s May 15, 2023 Order and modified by this Court’s September 28, 2023 Order. *See* ECF Nos. 319, 330. The requested extension will not materially affect the timely resolution of this case.

In support of this Motion, the Parties state as follows:

1. On September 22, 2023, the Parties exchanged expert reports in accordance with this Court’s May 15, 2023 Order.
2. On September 25, 2023, Jan Kostyun, one of QuoteWizard’s experts, informed the undersigned counsel for QuoteWizard that he was experiencing an unexpected medical issue requiring hospitalization.
3. Mr. Kostyun’s condition prohibited him from generating an expert rebuttal report by or before October 10, 2023 as originally required by this Court and he is still recovering from his medical condition.

4. Upon learning of Mr. Kostyun's circumstances, QuoteWizard promptly informed Plaintiff and requested a modest extension of the remaining discovery deadlines to allow Mr. Kostyun adequate time to recover.

5. The undersigned counsel for Plaintiff agreed to said extension in good faith and on September 27, 2023, the parties jointly moved for a 14-day extension of outstanding deadlines. *See* ECF No. 329.

6. On September 29, 2023, the Court allowed that motion. *See* ECF No. 330.

7. Shortly after the Court extended the deadlines, Mr. Kostyun was unexpectedly re-hospitalized.

8. Once again, the undersigned counsel for QuoteWizard promptly informed Plaintiff's counsel of this development and requested a further 30-day extension of outstanding deadlines in order to allow Mr. Kostyun to fully recuperate from his illness.

9. Plaintiff's counsel has agreed to this extension in good faith subject to the condition that QuoteWizard must unilaterally move for any further extensions from this Court. QuoteWizard's counsel does not anticipate any further extensions at this time.

10. For these reasons, the Parties request that the remaining deadlines be extended by thirty (30) days as follows:

Expert Rebuttal Reports:	November 24, 2023
Expert Depositions:	December 6, 2023
Motion for Class Certification:	January 4, 2023

11. This Motion is made in good faith and not for the purpose of delay.

The Parties respectfully request that this Court allow this Motion and extend the remaining discovery deadlines for the limited purpose of allowing QuoteWizard's expert witness sufficient time to recuperate from an ongoing medical issue.

Dated: October 11, 2023

Respectfully submitted,

Joseph Mantha,

By his attorneys,

/s/ Edward A. Broderick

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Respectfully submitted,

QuoteWizard.com, LLC,

By its attorneys,

/s/ Kevin P. Polansky

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CERTIFICATE OF SERVICE

I, Daniel M. Curran, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: October 11, 2023

/s/ Kevin P. Polansky

Kevin P. Polansky